

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
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In re:	Chapter 11
20230930-DK-BUTTERFLY-1, INC. f/k/a Bed Bath & Beyond, Inc., <i>et.al.</i> , ¹ Debtors.	Case No. 23-13359 (VFP) (Jointly Administered)
MICHAEL GOLDBERG, as Plan Administrator for 20230930-DK-BUTTERFLY-1, INC. f/k/a Bed Bath & Beyond, Inc., Plaintiff, v. INTERNAL REVENUE SERVICE, an agency of the United States of America, Defendant.	Adversary No. 24-01533 (VFP)

¹ The last four digits of Debtor Bed Bath & Beyond, Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtor's claims and noticing agent at <https://restructuring.ra.kroll.com/bbby/>.

**CERTIFICATION OF NO OBJECTION REGARDING PLAINTIFF'S AGREED
MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

1. On February 11, 2025, Michael Goldberg, solely in his capacity as the Plan Administrator (the "Plan Administrator") to 20230930-DK-Butterfly-1, Inc. (f/k/a/ Bed Bath & Beyond Inc.)² and affiliated debtors (the "Debtors") filed the *Plaintiff's Agreed Motion for Leave to File Amended Complaint* [Docket No. 30] (the "Agreed Motion") and the *Notice of Hearing on Plaintiff's Agreed Motion for Leave to File Amended Complaint* [Docket No. 30-1] (the "Notice").
2. The Plan Administrator served the Agreed Motion and the Notice on February 12, 2025, upon the parties listed in the Certificate of Service [Docket No. 31].
3. Pursuant to the Notice, the deadline for parties to file responses to the Agreed Motion was on February 25, 2025 (the "Objection Deadline"). No objections or responses to the Agreed Motion were filed on the docket on or before the Objection Deadline. The Plan Administrator has not received any informal responses to the Agreed Motion on or before the Objection Deadline.
4. The proposed order (the "Proposed Order") that was appended to the Agreed Motion is attached hereto as **Exhibit A**. The Plan Administrator respectfully requests that the Court enter the attached Proposed Order at the earliest convenience of the Court.

² Pursuant to the *Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc.*, which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as "Bed Bath & Beyond Inc." was changed to *20230930-DK-Butterfly, Inc.* [Filing ID No. 230921001833 DOS ID 315602].

Dated: March 3, 2025

/s/ Colin R. Robinson

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